

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re C.H. Robinson Worldwide, Inc.,)	CASE NO. 07-MD-01849
)	(JNE)
Overtime Pay Litigation)	
)	
)	
)	

**SUPPLEMENTAL DECLARATION OF LAWRENCE P. SCHAEFER
IN RESPONSE TO DEFENDANT C.H. ROBINSON
WORLDWIDE, INC.'S RENEWED MOTION TO DISMISS CLAIMS
OF OPT-IN PLAINTIFFS WITH PREJUDICE
FOR WANT OF PROSECUTION**

After first being duly sworn, I, Lawrence P. Schaefer, state the following:

1. I am Of Counsel to the law firm of Mansfield, Tanick & Cohen, P.A. (MTC), and am Lead Counsel representing the male opt-in plaintiffs in this case.

2. In the Declaration that was filed on January 18, 2008 in connection with the Defendant C.H. Robinson Worldwide, Inc.'s Renewed Motion to Dismiss Claims of Opt-In Plaintiffs with Prejudice for Want of Prosecution, I detailed MTC's compliance with this Court's Notice of Required Response by our various and unsuccessful efforts to contact Boris Sazhaev, a male opt-in plaintiff.

3. On January 24, 2008, Caitlin Grom, a legal assistant at Mansfield Tanick & Cohen, received a call from Boris Sazhaev. Ms. Grom learned that Mr. Sazhaev had discontinued his email address and had moved to Russia. Mr. Sazhaev had not received any of MTC's correspondence and was calling simply

out of curiosity. After Ms. Grom explained the status of the case, Mr. Sazhaev expressed his desire to be included in the settlement of the overtime litigation. Ms. Grom sent him the settlement agreement and W-9 form via email on the same day. Mr. Sazhaev has executed the documents and returned them via email, see Exhibit 1. The originals are being sent by mail and will be forwarded to CHRW as soon as MTC receives them.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of January 2008 in Minneapolis, Minnesota.

s/ Lawrence P. Schaefer
Lawrence P. Schaefer